

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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OTTERBOURG PC Melanie L. Cyganowski, Esq. Jennifer S. Feeney, Esq. Michael R. Maizel, Esq. mcyganowski@otterbourg.com jfeeney@otterbourg.com mmaizel@otterbourg.com 230 Park Avenue New York, NY 10169 Tel: (212) 905-3628 Fax: (212) 682-6104 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i>	MASSEY & GAIL LLP Jonathan S. Massey, Esq. Rachel S. Morse, Esq. jmassey@masseygail.com rmorse@masseygail.com 1000 Maine Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i>
In re: LTL MANAGEMENT, LLC, ¹ Debtor.	Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**SUPPLEMENTAL
CERTIFICATION OF ROBERT M. HORKOVICH, ESQ IN SUPPORT OF THE
APPLICATION FOR RETENTION OF PROFESSIONAL**

I, Robert M. Horkovich, being of full age, certify as follows:

1. I am seeking authorization for Anderson Kill P.C. (“Anderson Kill”), to be retained as special insurance counsel to the Official Talc Claimants Committee (the “Committee”) in the above- captioned case (the “Case”) effective as of June 1, 2023.
2. This certification (the “Supplemental Horkovich Certification”) shall supplement my certification in support of the retention of Anderson Kill, filed on May 3, 2023 (the “Horkovich Certification”). [Doc 947]
3. Attached as *Exhibit 2*, to the Horkovich Certification, it was disclosed that Anderson Kill performed work for certain interested parties, including Dollar General Corporation and Family Dollar Stores, Inc. Anderson had no fee collections from Dollar General Corporation and Family Dollar Stores, Inc. for the years 2021 or 2022. Below is a schedule of fee collections as percentage of gross revenue for the years 2021 and 2022 for the other interested parties disclosed.

Client	2021		2022	
		%		%
BRENNTAG NORTH AMERICA, INC. (103482)		0.9%		2.4%
Kaiser Gypsum Asbestos PI Trust (106701)		0.4%		0.7%
WALMART INC. (103128)		9.6%		8.1%

4. For clarification, Anderson’s representation of Brenntag North America, Inc. does not include representation of Whittaker, Clark & Daniels, Inc. Additionally, Anderson’s representation of Walmart with respect to Walmart’s insurance policies will include, in a small part, addressing Walmart’s talc liability, but not as to anything that might overlap with the Debtor’s or related case parties’ talc liability. The vast majority of all fees Anderson collected from Walmart relate to other matters such as claims against Walmart’s insurance companies for actions against Walmart’s directors and officers,

product liability claims against Walmart unrelated to talc, general liability insurance claims under Walmart's general liability policies for personal injuries unrelated to talc, and property damage for fires and destruction of Walmart property and business interruption coverage relating thereto. No one at Anderson working on a Walmart matter will have any involvement in the representation of the Committee.

5. The representation of the Committee is limited in the respect that Anderson Kill will not be involved on behalf of the Committee in any dispute that may arise between the Cyprus Mines Corporation estate and the LTL estate as to each entity's respective rights under the policies.

I certify under penalty of perjury that the above information is true.

Date: July 18, 2023

/s/ Robert M. Horkovich
ROBERT M. HORKOVICH, ESQ.